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January 27, 2023

Application denied.

SO ORDERED.



NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
February 1, 2023

Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *USA v Angel Hernandez*, 22 Cr. 702 (NRB)

Your Honor:

I write to ask that this Court grant permission for my client, Angel Hernandez, to travel and attend one event one week from today, on February 3, 2023. Since his arrest about one month ago, Mr. Hernandez has been on home detention, living with his mother in the Bronx. Mr. Hernandez, who is 18 years old, has been in full compliance with the conditions of his bond. He would now like to celebrate his birthday with his family by going with them to a bowling alley in White Plains. In order to attend the party, Mr. Hernandez would need permission to leave his home around 6 p.m., with the understanding that he would return home by around 9 p.m.

Previously, I spoke with the government and Mr. Hernandez's pre-trial services officer regarding a similar request, asking for permission for him to attend his niece's birthday party. At that time, neither pre-trial services nor the government took a position. Ultimately, that application was submitted too late for this Court to consider it.

Regarding the current application, the government has advised me that they defer to the position of pre-trial once more. I have been unable, however, to reach Mr. Hernandez's pre-trial officer. Considering pre-trial's position regarding the last application, my expectation is that pre-trial will similarly take no position on the current request. Still, in order to comply with this Court's directive about the timing of these types of requests, I am submitting this request today. But I will renew my efforts to reach the pre-trial office early next week, and will update this Court about any information I receive regarding this matter.

Respectfully submitted,

/s/

James E. Neuman